2011 Bailey St. Dearborn, MI 48124 Ph. (313) 914-7160 Fax (313) 914-7153

August 31, 2011

Division of Industrial and Medical Nuclear Safety Office of Nuclear Materials Safety and Safeguards U.S. Nuclear Regulatory Commission Washington, DC 20555-0001

License # 21-26460-02E

To Whom It May Concern:

Following is an amendment request for our E-License #21-26460-02E. Cammenga & Associates, LLC proposes to install Tritium filled vials into a new design of Protractor Compass as described in the enclosed package.

A separate request package was sent to the address above for the amendment to the SS&D Registry # NR-0210-D-101-E.

Sincerely,

CAMMENGA AND ASSOCIATES, LLC

Deborah Spykerman Radiation Safety Officer

Enclosures:

Amendment application for Exempt License, NRC Form 313

Enclosure 1 - Submission of items 5 and 6 of amendment application, NRC Form 313

Enclosure 2 - Current exemption license

Enclosure 3 - Discussion

Enclosure 4 - Compass comparison

Enclosure 5 - Prototype testing results

Attachment 1 - Drawings of Compass

NRC FORM 313

U.S. NUCLEAR REGULATORY COMMISSION

APPROVED BY OMB: NO. 3150-0120

EXPIRES: 3/31/2012

(3-2009) 10 CFR 30, 32, 33, 34, 35, 36, 39, and 40

APPLICATION FOR MATERIALS LICENSE

Estimated burden per response to comply with this mandatory collection request: 4.3 hours. Submittal of the application is necessary to determine that the applicant is qualified and that adequate procedures exist to protect the public health and safety. Send comments regarding burden estimate to the Records and FOIA/Privacy Services Branch (T-5 F53), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by internet e-mail to infocollects resource@nrc.gov, and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-10202, (3150-0120), Office of Management and Budget, Washington, DC 20503. If a means used to impose an information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.

INSTRUCTIONS: SEE THE APPROPRIATE LICENSE APPLICATION GUIDE FOR DETAILED INSTRUCTIONS FOR COMPLETING APPLICATION. SEND TWO COPIES OF THE ENTIRE COMPLETED APPLICATION TO THE NRC OFFICE SPECIFIED BELOW. APPLICATION FOR DISTRIBUTION OF EXEMPT PRODUCTS FILE APPLICATIONS WITH ILLINOIS, INDIANA, IOWA, MICHIGAN, MINNESOTA, MISSOURI, OHIO, OR WISCONSIN, SEND OFFICE OF FEDERAL & STATE MATERIALS AND APPLICATIONS TO: **ENVIRONMENTAL MANAGEMENT PROGRAMS** DIVISION OF MATERIALS SAFETY AND STATE AGREEMENTS U.S. NUCLEAR REGULATORY COMMISSION WASHINGTON, DC 20555-0001 MATERIALS LICENSING BRANCH U.S. NUCLEAR REGULATORY COMMISSION, REGION III 2443 WARRENVILLE ROAD, SUITE 210 LISLE, IL 60532-4352 ALL OTHER PERSONS FILE APPLICATIONS AS FOLLOWS: IF YOU ARE LOCATED IN: ALASKA, ARIZONA, ARKANSAS, CALIFORNIA, COLORADO, HAWAII, IDAHO, KANSAS, ALABAMA, CONNECTICUT, DELAWARE, DISTRICT OF COLUMBIA, FLORIDA, GEORGIA, LOUISIANA, MISSISSIPPI, MONTANA, NEBRASKA, NEVADA, NEW MEXICO, NORTH DAKOTA, OKLAHOMA, OREGON, PACIFIC TRUST TERRITORIES, SOUTH DAKOTA, TEXAS, KENTUCKY, MAINE, MARYLAND, MASSACHUSETTS, NEW HAMPSHIRE, NEW JERSEY, NEW YORK, NORTH CAROLINA, PENNSYLVANIA, PUERTO RICO, RHODE ISLAND, SOUTH CAROLINA, TENNESSEE, VERMONT, VIRGINIA, VIRGIN ISLANDS, OR WEST VIRGINIA, UTAH, WASHINGTON, OR WYOMING, SEND APPLICATIONS TO: SEND APPLICATIONS TO: LICENSING ASSISTANCE TEAM
DIVISION OF NUCLEAR MATERIALS SAFETY NUCLEAR MATERIALS LICENSING BRANCH U.S. NUCLEAR REGULATORY COMMISSION, REGION IV U.S. NUCLEAR REGULATORY COMMISSION, REGION I 612 E. LAMAR BOULEVARD, SUITE 400 **475 ALLENDALE ROAD** ARLINGTON, TX 76011-4125 KING OF PRUSSIA, PA 19406-1415 PERSONS LOCATED IN AGREEMENT STATES SEND APPLICATIONS TO THE U.S. NUCLEAR REGULATORY COMMISSION ONLY IF THEY WISH TO POSSESS AND USE LICENSED MATERIAL IN STATES SUBJECT TO U.S.NUCLEAR REGULATORY COMMISSION JURISDICTIONS 1. THIS IS AN APPLICATION FOR (Check appropriate item) 2. NAME AND MAILING ADDRESS OF APPLICANT (Include ZIP code) A. NEW LICENSE Cammenga & Associates, LLC 2011 Bailey St. B. AMENDMENT TO LICENSE NUMBER 21-26460-02E Dearborn, MI 48124 C. RENEWAL OF LICENSE NUMBER 3. ADDRESS WHERE LICENSED MATERIAL WILL BE USED OR POSSESSED 4. NAME OF PERSON TO BE CONTACTED ABOUT THIS APPLICATION Refer to Box 2 **Deborah Spykerman** TELEPHONE NUMBER (313) 914-7160 SUBMIT ITEMS 5 THROUGH 11 ON 8-1/2 X 11" PAPER. THE TYPE AND SCOPE OF INFORMATION TO BE PROVIDED IS DESCRIBED IN THE LICENSE APPLICATION GUIDE a. Element and mass number; b. chemical and/or physical form; and c. maiximum amount PURPOSE(S) FOR WHICH LICENSED MATERIAL WILL BE USED. which will be possessed at any one time 7. INDIVIDUAL(S) RESPONSIBLE FOR RADIATION SAFETY PROGRAM AND THEIR 8. TRAINING FOR INDIVIDUALS WORKING IN OR FREQUENTING RESTRICTED AREAS. TRAINING EXPERIENCE. 9. FACILITIES AND EQUIPMENT. 10. RADIATION SAFETY PROGRAM 12. LICENSE FEES (See 10 CFR 170 and Section 170.31) 11. WASTE MANAGEMENT. AMOUNT ENCLOSED FEE CATEGORY NA \$ 0.00 13. CERTIFICATION. (Must be completed by applicant) THE APPLICANT UNDERSTANDS THAT ALL STATEMENTS AND REPRESENTATIONS MADE IN THIS APPLICATION ARE BINDING UPON THE APPLICANT. THE APPLICANT AND ANY OFFICIAL EXECUTING THIS CERTIFICATION ON BEHALF OF THE APPLICANT, NAMED IN ITEM 2, CERTIFY THAT THIS APPLICATION IS PREPARED IN CONFORMITY WITH TITLE 10, CODE OF FEDERAL REGULATIONS, PARTS 30, 32, 33, 34, 35, 36, 39, AND 40, AND THAT ALL INFORMATION CONTANED HEREIN IS TRUE AND CORRECT TO THE BEST OF THEIR KNOWLEDGE AND BELIEF. WARNING: 18 U.S.C. SECTION 1001 ACT OF JUNE 25, 1948 62 STAT. 749 MAKES IT A CRIMINAL OFFENSE TO MAKE A WILLIFULLY FALSE STATEMENT OR REPRESENTATION TO ANY DEPARTMENT OR AGENCY OF THE UNITED STATES AS TO ANY MATTER WITHIN ITS JURISDICTION. CERTIFYING OFFICER -- TYPED/PRINTED NAME AND TITLE SIGNATURE DATE Deborah Spykerman, Radiation Safety Officer 08/31/2011 FOR NRC USE ONLY TYPE OF FEE FEE LOG FEE CATEGORY AMOUNT RECEIVED CHECK NUMBER COMMENTS

DATE

APPROVED BY

2011 Bailey St. Dearborn, MI 48124 Ph. (313) 914-7160 Fax (313) 914-7153

August 31, 2011

#5. RADIOACTIVE MATERIAL

Radioactive Material: Tritium

Mass:

3

Physical Form

Sealed Sources, Gas

1. Specifications

A. H-3 (tritium) Vials

The H-3 is contained in small laser-sealed glass vials coated with phosphorescent material coating the vials interior walls. The H-3 vials are used as radio-luminescent light sources for viewing the compass under dark conditions. These vials are attached to the compass with silicone (or like) adhesive. Specifications for the vials are as follows; each compass would contain 3 vials:

- ➤ 1 unit vial model #400/3 (vial contains 50 millicuries H-3)
- ≥ 2 units vial model #400/3 (each vial shall contain 25 millicuries H-3)
- > 3 units vial model #400/1 (vial contains 5 millicuries H-3)

The maximum total H-3 activity per compass will not exceed 115 millicuries. New vials will be purchased using same procedures as current and same vendor as current - mb microtec, A.G., Bern, Switzerland or other approved supplier.

B. Maximum H-3 possession limit for this license would remain 14,400 curies.

#6. PURPOSE(S) FOR WHICH LICENSED MATERIAL WILL BE USED

The licensed material (H-3) will be incorporated into the Compass for distribution to person(s) exempt from licensing. The H-3 vials will be received, handled, and used within the manufacturing process, in accordance with the guidelines found in the Manufacturing and Distribution NRC license Number 21-26460-02E for Cammenga and Associates, LLC, 2011 Bailey St. Dearborn, MI 48124. The finished product will be checked for quality, checked for safety, handled, and stored per our current safety guidelines found within MIL-PRF-10436N.

	07.4
NRC FORM	

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U.S. NUCLEAR REGULATORY COMMISSION

Amendment No. 09

MATERIALS LICENSE

Pursuant to the Atomic Energy Act of 1954, as amended, the Energy Reorganization Act of 1974 (Public Law 93-438), and Title 10, Code of Federal Regulations, Chapter I, Parts 30, 31, 32, 33, 34, 35, 36, 39, 40, and 70, and in reliance on statements and representations heretofore made by the licensee, a license is hereby issued authorizing the licensee to receive, acquire, possess, and transfer byproduct, source, and special nuclear material designated below; to use such material for the purpose(s) and at the place(s) designated below; to deliver or transfer such material to persons authorized to receive it in accordance with the regulations of the applicable Part(s). This license shall be deemed to contain the conditions specified in Section 183 of the Atomic Energy Act of 1954, as amended, and is subject to all applicable rules, regulations, and orders of the Nuclear Regulatory Commission now or hereafter in effect and to any conditions specified below.

Licensee	In accordance with the letter dated,					
	September 1, 2010,					
Cammenga & Associates	 License number 21-26460-02E is amended in its entirety to read as follows: 					
2. 100 Aniline Avenue	4. Expiration date July 31, 2013					
Holland, MI 49424	5. Docket No. 030-33020					
/-	Reference No.					

Byproduct, source, and/or special nuclear material

Hydrogen-3

- 7. Chemical and/or physical form
 - A. Glass Sealed Vials (MB Microtec Models 400/6, 400/3, 400/1)
- Maximum amount that licensee may possess at any one time under this license
 - A. Not Applicable (See Condition 11)

9. Authorized use:

Pursuant to 10 CFR Part 32.22, "Specific Domestic Licenses to Manufacture or Transfer Certain Items Containing Byproduct Material," the licensee is authorized to distribute self-luminous products as specified in Condition 10 of this license to persons exempt from the requirements for a license pursuant to 10 CFR Part 30.19, or equivalent provisions of the regulations of any Agreement State.

CONDITIONS

10. The following self-luminous products may be distributed pursuant to this license provided the amount of hydrogen-3 contained in each device does not exceed the amount specified:

Device Model
3H Series Compass

Maximum Activity per Device 120 mCi (4.44 GBq)

J582T Compass

15 mCi (555 MBq)

3H-Tritium Series Knife

60 mCi (2.22 GBq)

- 11. This license does not authorize possession or use of licensed material.
- 12. The licensee may distribute only from its facilities located at 100 Aniline Avenue N., Holland, Michigan and 2011 Bailey Street, Dearborn, Michigan.
- 13. The licensee shall file periodic reports as specified in Section 32.25(c), 10 CFR Part 32.

- 14. Except as specifically provided otherwise by this license, the licensee shall conduct its program in accordance with the statements, representations, and procedures contained in the documents, including any enclosures, listed below. The U.S. Nuclear Regulatory Commission's regulations shall govern unless the statements, representations and procedures in the licensee's application and correspondence are more restrictive than the regulations.
 - A. Letter dated January 28, 2003 and application dated January 29, 2003;
 - B. Registration Certificate No. NR-0210-D-101-E;
 - C. Facsimile dated April 03, 2003;
 - D. Facsimile dated April 08, 2003;
 - E. Facsimile dated June 23, 2003;
 - F. Facsimile dated July 14, 2003, sent 10:16am;
 - G. Facsimile addendum dated July 14, 2003, sent 10:28am;
 - H. Letter and application dated February 8, 2005;
 - I. Letter dated April 28, 2005;
 - J. Letter dated August 9, 2005;
 - K. Letter dated March 1, 2007;
 - L. Letter dated April 9, 2007;
 - M. Application dated December 27, 2006;
 - N. Electronic mail dated November 5, 2008 with attachment dated October 24, 2008;
 - O. Letter dated May 22, 2009.
 - P. Letter dated June 17, 2009
 - Q. Letter dated September 1, 2010

FOR THE U.S. NUCLEAR REGULATORY COMMISSION

Date September 22, 2010

By

J. Bruce Carrico

Licensing Branch
Division of Materials Safety and State Agreements

Office of Federal and State Materials and Environmental Management Programs

Washington, DC 20555

2011 Bailey St. Dearborn, MI 48124 Phone: (313) 914-7160 Fax: (313) 914-7153

August 31, 2011

GENERAL DISCUSSION

- A. Cammenga's new compass model, the "Destinate," is a protractor compass that has been in development for over a year. The idea was borne from several United States Army Rangers, who suggested we design a transparent protractor/baseplate style of compass to add to our offered mix of compasses.
- B. US Marines and Rangers currently use protractor compasses on missions involving the need for rapid navigation. The transparent nature of protractor compass allows navigators the ability to place the unit flat on a map and manually trace directional paths while still viewing the coordinates underneath the baseplate itself.
- C. The major problem with current protractor models available on the market is the lack of illumination needed for nighttime navigation.
- D. Cammenga engineers have been able to incorporate most of the same high quality components used in the Model 3H lensatic compass in the Destinate's design. As a result, the methods for protecting the Tritium vials will be very similar.
- E. The tritium vials used in the Destinate will be the same sized vials Cammenga currently uses for it's Model 3H, less one 5 mCi vial. The Destinate will have 3-5mCi vials, 2-25mCi vials & 1-50 mCi vial. The total H-3 will not exceed 115 millicuries, per compass.
- A. The model name for exempt distribution, containing H-3, shall be named as follows:

Model # D3-T Destinate

- B. Anticipated annual sales of this model are expected to be 10,000 units. This initial projection of distribution volumes will not require a change of our license regarding the amount of curies distributed annually.
- C. The expected useful daytime life of the compass is indefinite. With regards to the sealed sources (H-3 vials), the expected luminous life (night-use) of the compass is directly influenced by the half-life of H-3, which is 12.3 years.
- D. Each Compass shall be individually labeled with: "115 mCi ³H," our exempt distribution license # "21-26460-02E", and the model number "D3-T" in accordance with labeling methods specified in the NEUREG requirements.
- E. Product quality control procedures will follow those specified in MIL-PRF-10436N unless self-imposed quality procedures are more restrictive.

2011 Bailey St. Dearborn, MI 48124 Phone (313) 914-7160 Fax (313) 914-7153

August 31, 2011

A

Comparison of Cammenga & Associates' Lensatic, Magnetic, Military Compass - NSN 6605-01-196-6971 and D3-T Destinate, Protractor/Baseplate, Magnetic, Compass

Compass Element	Current Lensatic Compass	Model D3-T				
Fundamental Use	Unmounted with lanyard, hand	Unmounted with lanyard, to be				
	held	placed on flat map				
Magnetic Standard	Magnetic North pull	Magnetic North pull				
Sighting	Two sealed sources, one above	One sealed source at top of				
illumination	and one below site wire	baseplate				
Dial illumination	Back lighting provided by one	Back lighting provided by one				
	sealed source in cup and two	sealed source in cup and two				
	under "E" and "W"	under "E" and "W"				
Bezel indicator	One sealed source used	One sealed source used				
North illumination	One sealed sources used	One sealed source used				
Casing	Aluminum	Clear Nylon				
Dial Cover	Clear plastic Clear plastic					
Media securing	Dow Corning Permanent	Dow Corning Permanent				
sealed sources	Silicone Sealant. Continuous use	Silicone Sealant. Continuous use				
37	-76° to 400°F	-76° to 400°F				

B. **Prototype Testing:** The prototype testing was structured similar to the first article testing required on our current compass NSN 6605-01-196-6971, performed under MIL-PRF-10436N. Tests demonstrating the integrity of the compass, as well as the mounted sealed sources, include the impact durability test, thermo shock, luminosity test, diffusion, contamination test, and more. Each individual sealed source is also tested before installation into any compass – 100% of all vials are soak tested at the manufacturer, as well as 100% of all vials are soak tested at Cammenga & Associates, Inc. before installation into the compass; this assures no leaking or cracked vials. The methods and materials used in mounting the sealed sources into the Destinate compass would be the same methods and materials used in production of our military Lensatic compass, NSN 6605-01-196-6971. The history of methods and materials, dating back to the 1960's, unquestionably establishes a system and performance that has a well-proven track record. Ten prototypes were tested with the proposed sealed sources installed. The individual test description and the results are as follows:

Test #1 – Impact Durability of Vials: Test requirement is to drop compass from height of 100cm onto an unyielding, rigid steel surface. We wanted to satisfy the test and prove durability in a realistic environment; therefore we dropped onto steel and onto concrete. Each compass is to be dropped twice without effort to orient the compass. Our test was

to drop each compass 10 times onto both steel and concrete. Results – all sealed sources remained intact, with no unaided visual evidence of leakage, breaking, checking, shattering, or spalling of the sealed sources.

Test #2 – Thermal Shock (sealed sources only): Subject sealed sources to 2 successive cycles of thermal shock. Cycle begins by immediately placing the sealed sources into -52° ±2° C for 15 minutes. Remove sealed sources from cold environment and immediately place into temperature of 68° ±3° C for another 15 minutes. This constitutes 1 cycle. After the final cycle, allow sources to return to room temperature and examine. Result – no evidence of damage of degradation found.

Test #3 – Contamination: Wipe all exterior surfaces of compass with Whatman-50 filter paper. Determine the radioactive contamination by using a liquid scintillation machine. A removable contamination activity of more than 900 dpm per compass shall constitute failure of this test. Result – each compass tested < 900 dpm.

Test #4 – Diffusion: Submerge the compass into distilled water for 24 hours at $23^{\circ} \pm 5^{\circ}$ C. The compass shall be removed and 10ml of the water analyzed. If the radioactive content of the water exceeds 3,700 dpm, it shall constitute failure of this test. Result – each water sample tested < 3,700 dpm.

Test #5 – Luminosity Test: The assembled compass shall be examined for dead or dim luminous sources, after it has been dark-adapted for not less than 1 hour. The spectral and luminescent output shall be visually compared to other compasses and sealed sources of known quality. Sources of questionable luminosity shall be retested. Result – all sources passed test.

Test #6 – Engineering/Design: The sealed sources are installed within cavities on the back plate. The depth of the cavities is such that they will contain the vials 100% and in no way will the vials protrude past the top plane of the cavities. The vials are also encapsulated within silicone adhesive. The back plate, when assembled, is flush to the capsule, making it impossible for foreign objects to touch, damage, or break the vials.

NOTE: We also did subsequent, less scientific tests, such as trying to abuse the compass by banging the compass on a desktop, dropping and bending the back plate only, uninstalling the back plate and reinstalling the plate numerous times, with and without tools. All testing resulted in favorable outcomes.

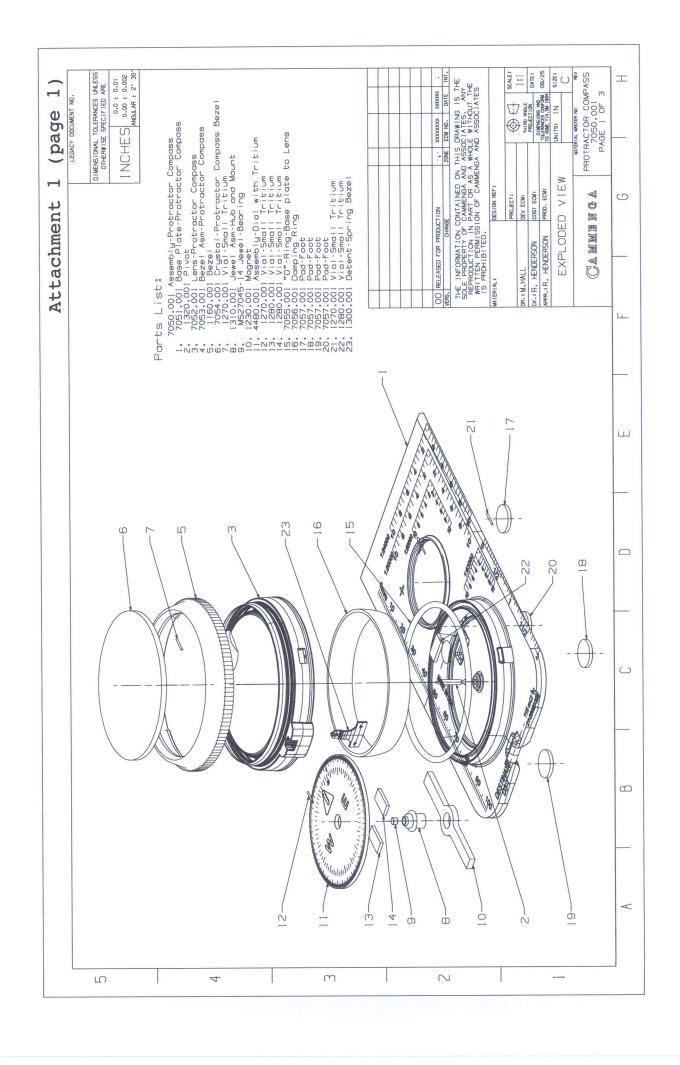
The tests performed, as listed above, demonstrates that the product design will maintain its integrity when subject to conditions of normal use as well as extreme use and likely accident conditions.

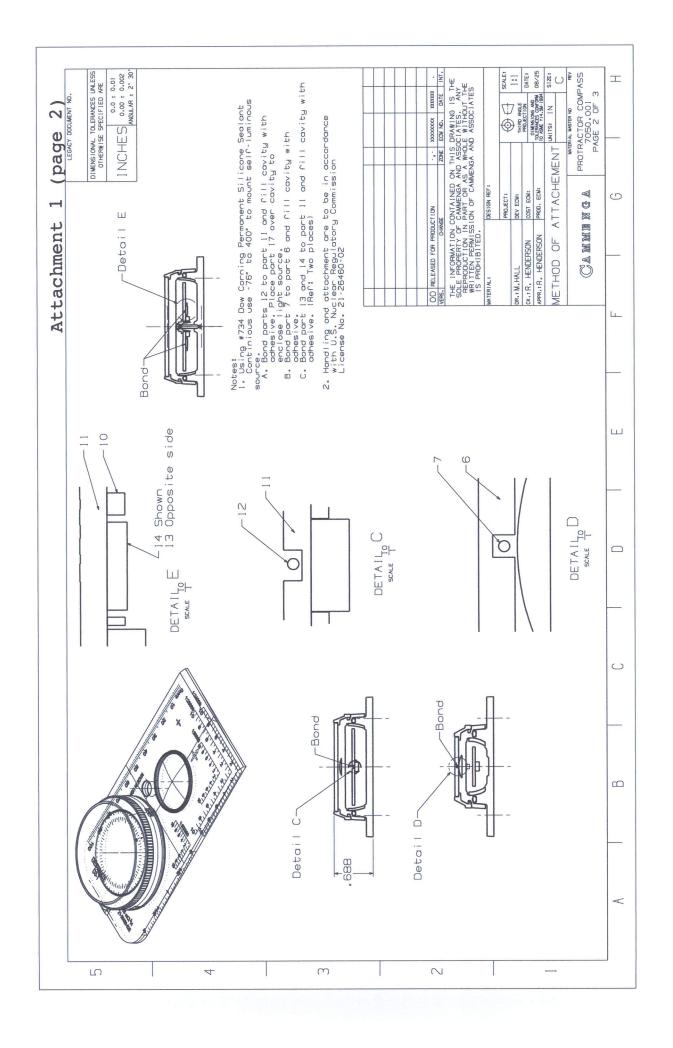
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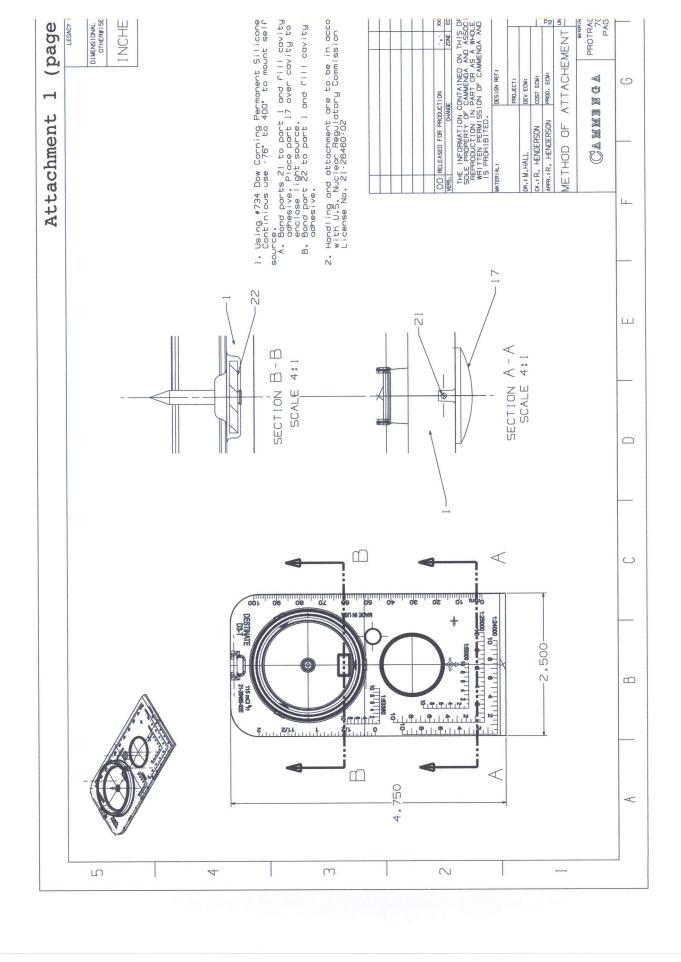
FINAL INSPECTION

prototype resting:

Diffusion & Leakage Luminosity Friction Error (6 UNITS Performance Compass error/ Mag. □ Freedom of Rotation 4.33 3.52 3.45 3.68 Damping Order# High/Low Temperature Shock Contamination Compass Visual MA Instruction Card NA #64 Lanyard 60"+- 2" Today's Date: July 21, 2011 NA Pouch Visual Disposition 0 Sample Size 0 **Size** ۵ Test Area Cammenga & Associates, Inc. Protractor - D3-T Destinate Final Inspection 2. Contract Review Check List: 5 4. Operation/Location: 6. Accept/Reject 1. Contractor: 5. Stamped # 3. Activity: W2 0 3







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